

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

NORTHEAST CONTROLS, INC.,
3 Enterprise Avenue
Clifton Park
New York, NY 12065

ST. PAUL MERCURY
INSURANCE COMPANY
385 Washington Street
St. Paul, MN 55102

Plaintiffs,

v.

FISHER CONTROLS
INTERNATIONAL, LLC.
205 S. Center Street
Marshalltown, Iowa 50158

Defendant.

Case No.: 06-412

**NOTICE OF DEPOSITION OF
GUIDO KARCHER**

To:	J. Scott Shannon, Esquire	Thomas P. Wagner, Esquire	Christopher Konzelmann
	Marshall Dennehey Warner	Marshall Dennehey Warner	White & Williams LLP
	Coleman & Goggin	Coleman & Goggin	1800 One Liberty Place
	1220 N. Market Street	1845 Walnut Street	Philadelphia, PA
	5 th Floor	Philadelphia, PA 19103	19103-7395
	Wilmington, DE 19801		

PLEASE TAKE NOTICE that, Defendant, by and through its attorneys of record, will take the testimony on oral examination of **Guido Karcher** pursuant to Rule 30 of the Federal Rules of Civil Procedure, before an official Court Reporter, a Notary Public, or in case of his/her inability to act or be present, before some other officer authorized to administer oaths,

**NOTICE OF DEPOSITION
OF GUIDO KARCHER**

4827-8522-7265.01
100507/1349

on , October 24, 2007, at 9:30 a.m. of said day at **Maron Marvel Bradley & Anderson, P.A., 75 Montgomery Street, Suit 200, Jersey City, NJ 07302.**

PLEASE TAKE FURTHER NOTICE that the deponent is commanded to produce the items described in Exhibit A (attached hereto) pursuant to the production schedule described in Exhibit A.

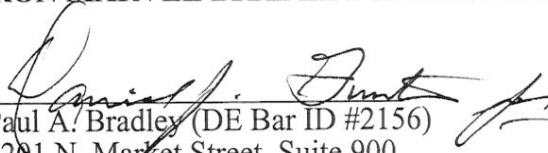
The deposition shall be continued from day to day until completed, excluding weekends and holidays. The deposition shall be recorded stenographically, and/or on audiotape.

If you have any questions or issues regarding the notice, please contact Patrick D. McVey or Daniel J. Gunter, RIDDELL WILLIAMS P.S., 1001 Fourth Avenue, Suite 4500, Seattle, WA 98154, (206) 624-3600, who will be responsible for the deposition on behalf of the Defendants.


DATED this ____ day of October, 2007.

**ATTORNEYS FOR DEFENDANT
FISHER CONTROLS INTERNATIONAL, LLC**

MARON MARVEL BRADLEY & ANDERSON

By: 
Paul A. Bradley (DE Bar ID #2156)
1201 N. Market Street, Suite 900
P.O. Box 288
Wilmington, DE 19899

RIDDELL WILLIAMS P.S.

By: 
Patrick D. McVey, WSBA #8489
Daniel J. Gunter, WSBA #27491
1001 Fourth Avenue, Suite 4500
Seattle, WA 98154

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th day of October, 2007, I caused to be served a true and correct copy of the foregoing document by the method indicated below and addressed as follows:

Mr. Thomas P. Wagner Marshall Dennehey Warner Coleman & Goggin 1845 Walnut Street Philadelphia, PA 19103 Phone: 215.575.4562 Fax: 215.575.0856 Email: tpwagner@mdwecg.com	(x) () () () (x)	U.S. Mail Hand Delivery Facsimile Overnight Mail Email
Mr. Joseph Scott Shannon Marshall, Dennehey, Warner, Coleman & Goggin 1220 Market Street, 5th Floor Wilmington DE 19801 Phone: (302) 552-4300 Fax: (302) 651-7905 Email: lawolhar@mdwecg.com	(x) () () () (x)	U.S. Mail Hand Delivery Facsimile Overnight Mail Email
Christopher Konzelmann White & Williams LLP 1800 One Liberty Place Philadelphia, PA 19103-7395 Phone: (215) 864-7000 Fax (215) 864-7123 Email konzelmannc@whiteandwilliams.com	(x) () () () (x)	U.S. Mail Hand Delivery Facsimile Overnight Mail Email

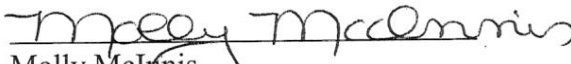

Molly McInnis

EXHIBIT A

1. Your Curriculum Vitae;
2. Your working file in this matter;
3. Your billing statements reflecting all work done by you in preparing your expert report or in formulating your opinion in this case;
4. Each and every document reviewed by you or utilized by you in preparing your expert report or in formulating your opinion in this case;
5. Each and every tangible thing reviewed by you or utilized by you in preparing your expert report or in formulating your opinion in this case;
6. Any and all photographs, charts, drawings, videotapes, diagrams, or other graphic representations or documents prepared by you or reviewed by you which relate to plaintiff's claim or your opinion in the case;
7. Any and all textbooks, treatises, articles, studies, abstracts or other documents that support the opinions in your report;
8. Any exhibits or demonstrative aids you plan to rely on at the trial in this matter; and
9. A list of the cases in which you have testified in the last four years.